



Ian Mance <ian@emancipatenc.org>

Irving v. City of Raleigh - deposition dates

Ian Mance <ian@emancipatenc.org>

Fri, Feb 24, 2023 at 9:37 AM

To: "Benton, Jason R." <jasonbenton@parkerpoe.com>

Cc: Michelle Liguori <Michelle.Liguori@elliswinters.com>, Abraham Rubert-Schewel <schewel@tinfulton.com>, Emily Gladden <egladden@tinfulton.com>, Nichad Davis <ndavis@tinfulton.com>, "Micheal L. Littlejohn Jr." <mll@littlejohn-law.com>, "elizabeth@emancipatenc.org" <elizabeth@emancipatenc.org>, "Kibler, Dottie" <dorothy.kibler@raleighnc.gov>, "Petty, Amy" <Amy.Petty@raleighnc.gov>, "Dixon, Jessica C." <jessicadixon@parkerpoe.com>, Rod Pettey <rpettey@ymwlaw.com>, Alayna Poole <apoole@ymwlaw.com>, Noreen Slattery <Noreen.Slattery@elliswinters.com>, Leslie Packer <leslie.packer@elliswinters.com>

Jason,

We are relying on the language of the order. If the court changes its order, we will certainly make Mr. Sweeney available to you. But the arguments we did or did not make in court do not control. The court's order controls, and the court's order stayed your client's participation in discovery. We feel we are on firm legal footing.

To answer your questions,

- (1) Yes, our objection is specific to your office only, since you represent Detective Abdullah. We have no issue with counsel for the other defendants taking his deposition.
- (2) We are objecting to you participating in any further discovery, for the reasons stated in my email.
- (3) Yes.
- (4) Yes.
- (5) Yes.
- (6) See above.
- (7) We don't take a position on whether these witnesses should or should not sit for two depositions.

If you appear at Mr. Sweeney's deposition, we will instruct him not to answer your questions on the grounds that the court has issued an order staying your participation in the discovery process.

Ian

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